

+Statement of Facts
CHAD WICKLINE - DAN WICKLINE

Beginning in January, 2004 and continuing thereafter to on or about December 31, 2004, CHAD WICKLINE and DAN WICKLINE became involved in a conspiracy with other individuals to launder money obtained by fraud ~~from~~ ^{thru} a ~~LIBERTY RESOURCES~~ ^{company} LIBERTY RESOURCES. LIBERTY RESOURCES was a company that marketed a credit card debt elimination scheme via the internet. All proceeds of the debt elimination scheme were split evenly between CHAD WICKLINE, DAN WICKLINE and their coconspirators.

LIBERTY RESOURCES had a website which contained numerous false and fraudulent representations regarding the effectiveness of the LIBERTY RESOURCES credit card debt elimination program, and the website was designed to induce potential clients to enroll in the program. Specifically, the website contained false testimonials from people who purportedly eliminated their entire credit card debt using the LIBERTY RESOURCES PROGRAM. Potential clients could access the LIBERTY RESOURCES website by typing in debt consolidation into a search engine on their computer. Investigation revealed that not one customer successfully eliminated their credit card debt using the program. Clients' reported that their credit history was destroyed when they discontinued paying their credit card balances and the banks sued them for payment. Many had to file bankruptcy.

Funds solicited from these debt elimination clients were deposited into a LIBERTY RESOURCES business checking account maintained at Huntington Bank, Pickerington, Ohio. Both defendants promoted the fraud scheme by received their share of the proceeds in checks from LIBERTY'S business account and an account in the name of WAGE INTERNATIONAL. CHAD WICKLINE received an amount that totaled \$388,056.01 and also wrote checks to other coconspirators totalling \$156,499.18. DAN WICKLINE received an amount that totaled \$229,958.29.

In addition, CHAD WICKLINE caused the mails to be used to promote the fraud scheme by having clients mail their service agreements and checks to LIBERTY RESOURCES. Specifically CHAD WICKLINE caused the mails to be used on January 30, 2004 when Martin Smith, mailed his service agreement and a check for \$3,700.00 to LIBERTY RESOURCES 6478 Winchester Blvd., Suite 111, Canal Winchester, Ohio.